

Caroline Lobdell (OSB #021236)
Aaron Bruner (OSB #133113)
WESTERN RESOURCES LEGAL CENTER
9220 SW Barbur Blvd., Suite 119-327
Portland, Oregon 97219
Email: clobdell@wrlegal.org
Email: abruner@wrlegal.org
Phone: (503) 768-8500

Julie A. Weis (OSB #974320)
HAGLUND KELLEY LLP
2177 SW Broadway
Portland, Oregon 97201
Email: weis@hk-law.com
Phone: (503) 225-0777

Counsel for Defendant-Intervenors

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PENDLETON DIVISION**

**GREATER HELLS CANYON COUNCIL,
OREGON WILD, CENTRAL OREGON
LANDWATCH, SIERRA CLUB, GREAT OLD
BROADS FOR WILDERNESS, and
WILDEARTH GUARDIANS,**

Plaintiffs,

v.

HOMER WILKES, in his official capacity as
Undersecretary for Natural Resources and
Environment; **GLENN CASMASSA**, in his official
capacity as Regional Forester for Region 6; and the
UNITED STATES FOREST SERVICE,

Defendants,

AMERICAN FOREST RESOURCE COUNCIL,
an Oregon non-profit association, and **EASTERN
OREGON COUNTIES ASSOCIATION**, an
unincorporated association,

Defendant-Intervenors.

Civil No. 2:22-cv-00859-HL

**JOINT MOTION TO AMEND CASE
SCHEDULE**

MOTION

Pursuant to the Court's Order dated October 12, 2022, Plaintiffs Greater Hells Canyon Council et al., Federal Defendants Homer Wilkes, Glenn Casamassa, and United States Forest Service, and Defendant-Intervenors American Forest Resource Council and Eastern Oregon Counties Association, hereby jointly move the Court to amend the case schedule for this matter.

In accordance with the Court's instructions, Defendant-Intervenors conferred with the existing parties and proposed staggered briefing dates that fit within and do not impact the current Case Management Schedule. The parties have agreed to stagger Defendant-Intervenors' summary judgment brief deadlines by one week after those of Federal Defendants and accommodate a request by Plaintiffs to a slight modification of the existing schedule in order to have adequate time to respond to the two briefs and give Federal Defendants a corresponding amount of time to reply to Plaintiffs. No change to the remaining dates is proposed. The parties believe this should not significantly impact the current schedule and hereby ask the Court to adopt the following schedule:

- Plaintiffs are to inform Defendants in writing as to their objections to the Administrative Record as described in the Proposed Joint Case Management Schedule by **11/4/2022**.
- Status Conference regarding motions to complete or supplement the Administrative Record, if any, and further case management scheduling is set for **11/21/2022**, at 01:00 PM in Pendleton by telephone before Magistrate Judge Andrew D. Hallman.
- Consent to Jurisdiction by a Magistrate Judge, if any, is to be filed by **12/12/2022**.
- Plaintiffs' Motion for Summary Judgment and Supporting Memorandum is due by **12/12/2022**.
- Defendants' combined Cross-Motion for Summary Judgment and Supporting Memorandum is due by **1/20/2023**.

- Intervenor's combined Cross-Motion for Summary Judgment and Supporting Memorandum is due by **1/27/2023**.
- Plaintiffs' combined Response to Defendants' Cross-Motion for Summary Judgment and Reply in Support of Plaintiffs' Motion for Summary Judgment is due by **2/24/2023**.
- Defendants' Reply in Support of their Cross-Motion for Summary Judgment is due by **3/13/2023**.
- Intervenor's Reply in Support of their Cross-Motion for Summary Judgment is due by **3/20/2023**.
- Oral Argument is set for **4/12/2023** at 01:30 PM in Pendleton before Magistrate Judge Andrew D. Hallman.

Respectfully submitted this 20th day of October, 2022.

Caroline Lobdell (OSB #021236)
Aaron Bruner (OSB #133113)
s/ Aaron Bruner
WESTERN RESOURCES LEGAL CENTER
9220 SW Barbur Blvd., Suite 119-327
Portland, Oregon 97219
Email: clobdell@wrlegal.org
Email: abruner@wrlegal.org
Phone: (503) 768-8500

Julie A. Weis (OSB #974320)
HAGLUND KELLEY LLP
2177 SW Broadway
Portland, Oregon 97201
Email: weis@hk-law.com
Phone: (503) 225-0777

Counsel for Defendant-Intervenors

s/ Meriel L. Darzen (with permission)
Meriel L. Darzen, OSB No. 113645
(503) 525-2725 | meriel@crag.org
Oliver J. H. Stiefel, OSB No. 135436,
(503) 227-2212 | oliver@crag.org
Crag Law Center
3141 E Burnside Street

Portland, Oregon 97214
Fax: (503) 296-5454

Counsel for Plaintiffs

s/ Hayley A. Carpenter (with permission)

HAYLEY A. CARPENTER

TYLER M. ALEXANDER

ANTHONY D. ORTIZ

Trial Attorneys

Natural Resources Section

Wildlife & Marine Resources Section

150 M St. NE

Washington, D.C. 20002

Phone: (202) 305-0242 (Carpenter)

(202) 305-0238 (Alexander)

(202) 307-1147 (Ortiz)

hayley.carpenter@usdoj.gov

tyler.alexander@usdoj.gov

anthony.d.ortiz@usdoj.gov

Counsel for Defendants